

EXHIBIT 4

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al., Case No. 02 Civ. 6977
Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849
Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978
Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al., No. 04 Civ. 1923
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al., No. 04 Civ. 7065
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279

PLAINTIFFS' SECOND SET OF SUPPLEMENTAL REQUESTS FOR
PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANT
MUSLIM WORLD LEAGUE

THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES
August 22, 2013

**PLAINTIFFS' SECOND SET OF SUPPLEMENTAL REQUESTS FOR
PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANT
MUSLIM WORLD LEAGUE**

Plaintiffs in *Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al.*, Case No. 02 Civ. 6977, *Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03 Civ. 9849, *Federal Insurance Co., et al. v. al Qaida, et al.*, Case No. 03 Civ. 6978, *Estate of John P. O'Neill, Sr., et al. v. Al Baraka, et al.*, Case No. 04 Civ. 1923, *Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04 Civ. 5970, *Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al.*, Case No. 04 Civ. 7065, and *Euro Brokers Inc., et al., v. Al Baraka, et al.*, Case No. 04 Civ. 7279, propound and serve on the Muslim World League (hereinafter "Defendant" or "MWL"), the following Second Set of Supplemental Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The "Instructions" and "Definitions" set forth in the Plaintiffs' First and First Supplemental Sets of Requests for Production of Documents directed to the Muslim World League are incorporated herein by reference, except the following definition shall also apply:

1. The terms "MWL," "Defendant," "You," and "Your" shall refer to the Muslim World League and any branch office, subsidiary, affiliate, officer, director, trustee, employee, attorney, consultant, accountant, agent, alter ego, volunteer, or representative acting on the Muslim World League's behalf and/or at its direction.

**PLAINTIFFS' SECOND SET OF SUPPLEMENTAL REQUESTS FOR
PRODUCTION OF DOCUMENTS DIRECTED TO DEFENDANT
MUSLIM WORLD LEAGUE**

1. Please provide all documents governing, describing, detailing, or otherwise relating to any relationship between the MWL and Abdullah Omar Naseef, Abdullah al Obaid, Adnan Basha, and Abdullah al Turki (hereinafter collectively referred to as the "Charity Officials"), including without limitation, all documents relating to all positions the Charity Officials held or hold within the MWL. Responsive documents shall include, but are not limited to, their personnel or employment files.

ANSWER:

2. Please provide all documents relating to any notification received by any of the Charity Officials of any alleged involvement of any branch office, official, employee, or representative of the MWL in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.

ANSWER:

3. Please provide all documents relating to any involvement or participation of any of the Charity Officials in the review, analysis, investigation, or discussion of any alleged involvement of any branch office, official, employee, or representative of the MWL in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.

ANSWER:

4. Please provide all documents relating to any notification received by any of the Charity Officials of any alleged misuse or misappropriation of funds or resources by any branch office, official, employee, or representative of the MWL.

ANSWER:

5. Please provide all documents relating to any involvement or participation of any of the Charity Officials in the review, analysis, investigation, or discussion of any alleged misuse or misappropriation of funds or resources by any branch office, official, employee, or representative of the MWL.

ANSWER:

6. Please provide all documents relating to any allegation that any of the Charity Officials were involved in any criminal, extremist, terrorist, militant, jihadist, or separatist activities.

ANSWER:

7. Please provide all documents relating to any meeting between any of the Charity Officials and any representative of the Saudi government or any foreign government.

ANSWER:

8. Please provide all documents relating to any meeting between any of the Charity Officials and any representative of any separatist or independence movement or organization.

ANSWER:

Respectfully submitted,

Dated: August 22, 2013

BY:



THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES


CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Plaintiffs' Second Set of Supplemental Requests for Production of Documents Directed to Defendant Muslim World League was served via electronic mail and U.S. first-class mail, postage prepaid, this 22nd day of August 2013, upon:

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(Defendants' Executive Committee's appointed representative to receive discovery requests and responses in 03-MDL-1570)



J. Scott Tarbutton, Esq.